

CB/NT 26.9.7

This is NOT
enforcement confidential

8-23-93

Bartus thoroughly reviewed Reichhold's request for changes to their permit, and his comments were incorporated into the final permit mods sent out for public comment. The main thrust of the changes was to allow reduced chemical monitoring of groundwater for the purposes of demonstrating operational hydraulic performance of the pump and treat system (i.e., Reichhold and RCRA will primarily evaluate success and effectiveness of extraction wells EW-4 and EW-10 by interpreting water level measurements over time, as the system continues to operate, rather than performing expensive chemical analyses). Chemical monitoring will still occur in some wells (see mods).

EW-4 and EW-10 are currently in operation, with discharge of treated effluent to POTW by batch.

Finally, once GW pump and treat is "completed" (years from now), Reichhold will need to demonstrate compliance with Groundwater Protection Standards at **each well**.

USEPA SF



1266485

Reichhold Chemicals, Inc.

3320 Lincoln Avenue
Tacoma, WA 98421

August 18, 1993

RECEIVED
AUG 20 1993
SUPERFUND REMEDIAL BRANCH

REICHHOLD

Ms. Karen Keeley
Environmental Scientist
U.S. EPA Region X
1200 6th Avenue
Seattle, WA 98101

Dear Ms. Keeley:

In accordance with 40 CFR 270.42(b), Reichhold Chemicals, Inc is notifying you that the facility has requested EPA approval for a Class II modification of the facility's Resource Conservation and Recovery Act (RCRA) Permit WAD 00925 2891. The modification affects Reichhold's Corrective Action Monitoring Program.

A 60-day period for public comment regarding the modification will commence on August 23, 1993. You are invited to submit comments to the following:

Mr. David Bartus
Hazardous Waste Division
Environmental Protection Agency Region 10
1200 Sixth Avenue
Seattle, WA 98101
(206) 553-2804

Copies of the modification request and supporting documentation may be viewed and copied at the following location:

Tacoma Public Library, Main Branch
Northwest Room
1102 Tacoma Avenue South
Tacoma, WA 98402

An informal meeting open to the public will be held on September 8, 1993 at 6 pm at the following location:

Tacoma Public Library, Kobetich Branch
212 Brown's Point Blvd. N.E.
Tacoma, Washington 98401

Ms. Karen Keeley
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August 18, 1993

Questions regarding this notice may be directed to Mr. Bartus at (206) 553-2804, or to myself at (206) 627-0406. The permittee's compliance history during the life of the permit being modified is available from Mr. Bartus.

Sincerely,



John J. Oldham
Tacoma Site Manager
Reichhold Chemicals, Inc.

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cc: Chief, Hazardous Waste Management Branch EPA Region 10
Director, Hazardous Waste Division EPA Region 10
David Bartus, RCRA Permits Section EPA Region 10
Michael Kowalski, Reichhold Chemicals, Inc
James Bausano, CH2M HILL
Ken Trotman, CH2M HILL
Reichhold Facility Mailing List (62 entries)

Dave B. (Mike hasn't seen).

Reichhold Chemicals, Inc.

3320 Lincoln Avenue
Tacoma, Washington 98421

REICHHOLD

August 16, 1993

Mr. Michael Gearheard
Chief, Waste Management Section
Environmental Protection Agency, Region 10
1200 Sixth Avenue
Seattle, WA 98101

Subject: EPA ID# WAD 00925 2891 Request for Class II Permit Modification

Dear Mr. Gearheard:

In accordance with 40 CFR 270.42 (b)(1), Reichhold Chemicals, Inc. (Reichhold) is requesting a Class II modification to the Tacoma facility's RCRA Permit (Permit No. WAD 00925 2891). The proposed modifications will affect Reichhold's Corrective Action Monitoring Program. These modifications are based on information gained during the Precorrective Action Monitoring Program and are intended to allow more effective and efficient monitoring of the progress of corrective actions at the Reichhold site. The requested modifications were first proposed to the Environmental Protection Agency (EPA) in a report titled *Proposal to Modify Corrective Action Monitoring Program* (CH2M HILL, 1992). The permit modifications listed in this Class II modification request include those which have been tentatively accepted by EPA in a letter to Reichhold dated April 9, 1993. The enclosed document:

- Describes changes to permit conditions and supporting documents referenced by the permit;
- Identifies the request as a Class II modification;
- Provides a rationale for the requested changes; and
- Provides the applicable information required by 40 CFR 270.13 through 270.21, 270.62, and 270.63.

In accordance with 40 CFR 270.42 (b) (2), Reichhold will send notice of the modification request to all persons on the facility mailing list and to appropriate units of the State and local government as specified in 40 CFR 124.10 (c) (ix) and will publish this notice in a major local newspaper of general circulation. The notice will be mailed and published within 7 days before or after the date of submission of the modification request. Reichhold will provide the Director with evidence of the mailing and publication..

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AUG 18 1993

Tel: (206) 627-0406
Fax: (206) 627-0422

WASTE MANAGEMENT BRANCH

If you have any questions or require further information please contact me at 206/627-0406.

Sincerely,

A handwritten signature in cursive script that reads "John J. Oldham".

John J. Oldham
Tacoma Site Manager

Date:

cc: Dave Bartus/ EPA, Region 10
Supervisor/ Hazardous Waste Section, Washington State Department of Ecology
Jim Bausano/ CH2M HILL

CLASS II PERMIT MODIFICATION REQUEST

**EPA ID# WAD 00925 2891 CLASS II PERMIT MODIFICATION REQUEST
CORRECTIVE ACTION MONITORING PROGRAM**

Reichhold Chemicals, Inc. (Reichhold), proposes the following modifications of the Tacoma facility's Resource Conservation and Recovery Act (RCRA) Permit WAD 00925 2891. The proposed modifications will affect Reichhold's Corrective Action Monitoring Program. These modifications are based on information gained during the Precorrective Action Monitoring Program, conducted from December 1989 to March 1993, and are requested to allow more efficient and effective monitoring of the progress of corrective actions at the Reichhold site. The requested modifications were first proposed to the Environmental Protection Agency (EPA) in a report titled *Proposal to Modify Corrective Action Monitoring Program* (CH2M HILL, 1992). The permit modifications listed in this Class II modification request include those which have been tentatively accepted by the EPA in a letter to Reichhold Chemicals, Inc. dated April 9, 1993

The specific changes to Reichhold's RCRA Permit WAD 00925 2891 would be as follows:

V.C. (1)(c) Water Quality Monitoring. The Permittee requests the following modification:

Current Permit Language:

- (c) Water Quality Monitoring The Permittee shall obtain the groundwater samples during the corrective action monitoring program as in accordance with Attachment 17 as modified by this permit. All corrective action monitoring wells shall be sampled annually for the Table 6 (page 69 of this permit). The most contaminated well (based on total organics) will be sampled annually for Appendix IX.
- (i) Shallow Wells A, B, W, 1, 2, 4, 5, 11, 12, 13, 14, 19, 34, 27, 42, 43, and any new off-site wells found during the groundwater assessment program to be contaminated shall be monitored:
1. Quarterly for Table 5 (page 68 of this permit) until the hydraulic barrier is shown to be effective pursuant to Condition V.C.(1)(f)(iii), and
 2. Semi-annually for Table 5 (page 68 of this permit) after the hydraulic barrier is shown to be effective pursuant to Condition V.C.(1)(f)(iii).
- (ii) Intermediate Wells 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 29, 30, (40) and any other newly installed well found to be contaminated with levels above the Groundwater Protection Standard (Table 7 on page 70 of this permit) during the pre-corrective action monitoring

○ = BW

44
45
46
47

period shall be monitored:

1. Quarterly for Table 5 (page 68 of this permit) until the system performance standards outlined in Condition V.C.(1)(f)(iii) for the intermediate aquifer have been met.
 2. Semi-annually for Table 5 (page 68 of this permit) after the system performance standards outline in Condition V.C.(1)(f)(iii) for the intermediate aquifer have been met.
- (iii) All Deep Aquifer Wells shall be monitored quarterly for formaldehyde, molybdenum and any additional parameters found in the deep aquifer during the pre-corrective action sampling program above the Groundwater Protection Standard (Table 7 on page 70 of this permit), until either: mw-40 d
1. the intermediate aquifer wells meet the performance standards outline in condition V.C.(1)(f)(iii) and an alternate deep aquifer monitoring plan has been approved, or
 2. the deep Aquifer wells are below the Groundwater Protection Standards or an approved Alternate Concentration limit for four consecutive quarters, or
 3. a deep aquifer clean up plan and alternate deep aquifer monitoring plan have been approved.
- (iv) Within two years after the start of the intermediate extraction system, the Permittee must submit to the Administrator either a demonstration that the deep aquifer is being cleaned up by the corrective action in the upper aquifers, a request for an Alternate Concentration Limit, or a deep aquifer clean-up plan.

Proposed Permit Modification:

- (c) Water Quality Monitoring The Permittee shall obtain the groundwater samples during the corrective action monitoring program as in accordance with Attachment 17 as modified by this permit, as specified below:
- (i) All corrective action monitoring wells specified in paragraphs (ii), (iii), and (iv) below as modified pursuant to paragraph (v) shall be sampled annually for constituents identified in Table 6 of this permit.

Alternately, one or more samples of wastewater treatment plant influent may be obtained at least annually as necessary to represent flow from the SID, the on-site intermediate aquifer extraction system, and the off-site intermediate aquifer extraction system, and any other significant sources of treatment plant influent. These samples shall be analyzed for modified Appendix IX constituents.

- (ii) Shallow Wells. Wells MW-4(S), MW-5(S), MW-9(S), MW-10(S), MW-12(S), MW-33(S), MW-42(S), MW-56(S), and shallow interceptor drain sumps S-1, S-2, S-3, S-4, S-5, and S-6 shall be sampled semiannually for Table 5 constituents. This sampling shall continue until the shallow aquifer system performance standards of permit condition V.C. (1)(f)(iii) are met, or until the 15-month period identified in permit condition V.C. (1)(f)(ii) expires, whichever occurs sooner.

Wells MW-1(S), MW-2(S), MW-4(S), MW-9(S), MW-11(S), MW-12(S), MW-14(S), MW-21(S), MW-27(S), MW-33(S), MW-42(S), MW-51(S), MW-54(S), MW-56(S), and MW-57(S) shall be sampled annually for Table 7 constituents (pages 70 and 71 of this permit). This sampling shall begin after the shallow aquifer system performance standards of permit condition V.C. (1)(f)(iii) are met, or the 15-month period identified in permit condition V.C. (1)(f)(ii) expires, whichever occurs sooner.

- (iii) Intermediate Aquifer Wells. MW-2(I), MW-4(I), MW-6(I), MW-8(I), MW-10(I), MW-11(I), MW-13(I), MW-30(I), MW-44(I), MW-45(I), MW-48(I), and extraction wells EW-3, EW-4, EW-5, EW-6, EW-7, EW-8, EW-9, EW-10, shall be sampled semi-annually for constituents identified in Table 5 (page 68) of this permit. - is VC in table 5

MW-2(I), MW-4(I), MW-7(I), MW-12(I), MW-16(I), MW-17(I), MW-22(I), MW-28(I), MW-30(I), MW-36(I), MW-37(I), MW-39(I), MW-41(I), MW-44(I), MW-45(I), MW-46(I), MW-48(I), MW-50(I), and MW-53(I) shall be sampled annually for Table 7 constituents (pages 70 and 71 of this permit). This sampling shall begin after the intermediate aquifer system performance standards of permit condition V.C. (1)(f)(iii) are met, or the 15-month period identified in permit condition V.C. (1)(f)(ii) expires, whichever occurs sooner.

- (iv) Deep Aquifer. All deep aquifer monitoring wells shall be sampled quarterly for formaldehyde, molybdenum, and any other additional parameters found in the deep aquifer during the pre-corrective action sampling program above the Groundwater Protection Standard (Table 7 on page 70 of this permit), until either:

what's this?

*what happened
to MW-44? ²
it was sampled
before
we have
MW-47
or MW
but it
isn't
sampled
well*

1. the intermediate aquifer wells meet the system performance standards outlined in condition V.C.(1)(f)(iii) and an alternate deep aquifer monitoring plan has been approved, or
 2. the deep aquifer wells are below the Groundwater Protection Standards or an approved Alternate Concentration limit for four consecutive quarters, or
 3. a deep aquifer clean up plan and alternate deep aquifer monitoring plan have been approved.
- (v) The identity and sampling frequency of shallow and intermediate aquifer wells monitored during the corrective action monitoring program may be modified upon approval of the Administrator, provided that Permittee can demonstrate that such changes result in equal or improved ability of the intermediate aquifer monitoring well system to demonstrate compliance with permit condition V.C. (1)(f)(ii). Such changes shall not require permit modification.

Section V.C. (1)(d).

Not used. Numbering in permit should be modified.

Section V.C. (1)(f) Groundwater Protection Standards. The Permittee requests the following modification to permit condition V.C. (1)(f)(ii):

Current Permit Language:

- (ii) [Section V.C. (1)(f)(ii) paragraph 1 is unchanged]

This demonstration shall include graphical time trend analyses (including total organics) at each corrective action and groundwater monitoring well, plus other analyses deemed appropriate by the Permittee to evaluate progress toward meeting the Groundwater Protection Standards (Table 7).

[Section V.C. (1)(f)(ii) paragraph 3 is unchanged]

Proposed Permit Modification:

- (ii) This demonstration shall include graphical time-trend analyses of indicator

parameters, (currently Table 5), at appropriate corrective action and groundwater monitoring wells, plus other analyses deemed appropriate by the Permittee to evaluate progress toward meeting the Groundwater Protection Standards (Table 7).

Table 6. The Permittee requests the following modification to the specified formaldehyde analysis method in Table 6 of the permit:

Current Permit Language:

<u>Sample Parameter</u>	<u>EPA Method</u>
Formaldehyde	NIOSH

Proposed Permit Modification:

<u>Sample Parameter</u>	<u>EPA Method</u>
Formaldehyde	8315

Rationale: Experience with Blair Backup property investigations indicated that the NIOSH method used for formaldehyde analyses is sensitive to interferences encountered in Commencement Bay aquifers. This method may yield artificially high results from turbid or colored (iron-containing) samples. Since issuance of Reichhold's permit, EPA method 8315 has been developed for formaldehyde analyses in water. Although this method is currently in draft, it is expected to appear in the next revision of SW-846.